

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

NATHAN ROWAN, individually, and on  
behalf of all others similarly situated,

Plaintiff

v.

BROCK PIERCE, an individual,

Defendant.

Case No.: 3:20-cv-01648-RAM

**STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Local Rule 41(a), it is hereby stipulated and agreed by and between Plaintiff Nathan Rowan and Defendant Brock Pierce, through their undersigned counsel, that the above-captioned action be voluntarily dismissed with prejudice. Each side will bear its own attorney's fees and costs.

Dated: July 15, 2024

Respectfully submitted,

**MORELL CARTAGENA & DAPENA LLC**

**MELLADO & MELLADO-VELLARREAL**

/s/ Iván J. Lladó

Ramón Dapena

USDC-PR Bar No. 125005

E-mail: [ramon.dapena@mbcdlaw.com](mailto:ramon.dapena@mbcdlaw.com)

Iván J. Lladó, Esq.

USDC-PR Bar No. 302002

Email: [ivan.llado@mbcdlaw.com](mailto:ivan.llado@mbcdlaw.com)

Ponce de León Ave. 273 Av. De la Constitución,  
Suite 700

San Juan PR 00908 Puerto Rico

Telephone: 787-723-1233

Facsimile: 787-723-8763

/s/ Jairo Mellado

Hector Orejuela--Dávila

USDC-PR No. 301111

[horejuela@mellado.com](mailto:horejuela@mellado.com)

USDC-PR No. 208112

Jairo Mellado

[jmellado@mellado.com](mailto:jmellado@mellado.com)

165 Ponce de Leon Ave., Suite 102

San Juan, PR 00917

Telephone: (787) 767-2600

Facsimile: (787) 767-2645

**HOLLAND & KNIGHT LLP**

/s/ Ashley L. Shively

Ashley L. Shively (*pro hac vice*)  
560 Mission Street, 19th Floor  
San Francisco, CA 94105  
Telephone: (415) 743-6900  
E-mail: ashley.shively@hkllaw.com

Kayla L. Pragid (*pro hac vice*)  
Lisa Kohring (*pro hac vice*)  
777 S. Flagler Street, 1900W  
West Palm Beach, FL 33401  
Telephone: (561) 650-8303  
E-mail: kayla.pragid@hkllaw.com  
Email: lisa.kohring@hkllaw.com

Paul Bond (*pro hac vice*)  
Cira Centre, Suite 800  
2929 Arch Street  
Philadelphia, PA 19104  
Telephone: (215) 252-9535  
Email: Paul.Bond@hkllaw.com

*Attorneys for Defendant Brock Pierce*

**KAUFMAN, P.A.**

/s/ Avi R. Kaufman

Avi R. Kaufman (*pro hac vice*)  
237 South Dixie Highway, Floor 4  
Miami, FL 33133  
Telephone: (305) 469-5881  
Email: kaufman@kaufmanpa.com

-and-

**LAW OFFICES OF STEFAN COLEMAN, P.A.**  
Stefan Coleman (*pro hac vice*)  
201 S. Biscayne Blvd, 28th FL  
Miami, FL 33131  
Telephone: (877) 333-9427  
law@stefancoleman.com

-and-

**BAILEY GLASSER LLP**  
John W. Barrett (*pro hac vice*)  
209 Capitol Street  
Charleston, WV 25301  
Telephone: (304) 340-2287  
Email: jbarrett@baileyglasser.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on July 15, 2024, I filed a copy of the foregoing document using the Court's CM/ECF system, which will automatically generate a Notice of Electronic Filing to all counsel of record in this matter.

/s/ Ashley L. Shively  
Ashley L. Shively